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December 1, 2011

Ms. Carmen Anderson
Indiana Department of Environmental Management
Voluntary Remediation Program
Office of Land Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

Re: **Interim Response and Activity Update Report
to IDEM's Request for Revised Remediation Work Plan
Approval Review and Technical Response
to General Notice of Potential Liability Review
Michigan Plaza**
3801-3823 West Michigan Street
Indianapolis, Indiana 46222
IDEM VRP #6061202
MUNDELL Project No. M01046

Dear Ms. Anderson:

This brief interim response and activity update letter is being submitted to the Indiana Department of Environmental Management (IDEM) by MUNDELL & ASSOCIATES, INC. (MUNDELL), on behalf of AIMCO Michigan Meadows Holdings, LLC (AMMH), to document recent Site assessment work responding to IDEM's letter, '*Request for Revised Remediation Work Plan Approval Review and Technical Response to General Notice of Potential Liability Review*' dated June 22, 2011.

Since the receipt of the IDEM letter, MUNDELL has completed the following scope of additional investigation activities at the Site. This has included:

- 1) The completion of three (3) additional nested pairs of monitoring wells: two southwest of the Michigan Plaza (denoted MMW-P-11S/D and MMW-P-13S/D), and one near the northwest Site boundary between **Source Area B** and a nearby residence (MMW-P-12S/D). These nested pairs of monitoring wells were installed according to the *Revised Work Plan for Third Round of CAP 18 METM Injections* dated July 22, 2011, submitted by MUNDELL to IDEM and subsequently approved in a letter dated August 22, 2011.
- 2) The completion of a total of six (6) 2-dimensional resistivity geophysical profile lines supplemented with seismic refraction analysis. These geophysical activities were completed to aid in the detailed assessment and interpretation of the geologic variability in the vicinity of the Site and surrounding area, specifically, the distribution of fine-grained glacial till sequences and unconsolidated sand and gravel units, and the top of bedrock surface.
- 3) Field review and activity monitoring of the U.S. EPA's area investigation activities along and east of Holt Road. Activities included selected split sampling to support determination of the source of vinyl chloride impacts at the West Vermont Street residences.

In addition, based on the description of further investigation activities to be completed in its *Quarterly Monitoring Report – 3rd Quarter 2011*, dated October 31, 2011, and the scope of work MUNDELL provided to IDEM in its *Notification of Additional Soil and Groundwater Investigation Activities* dated November 30, 2011, the following activities will also be completed during the next six weeks:

- 1) The completion of ten (10) soil borings southeast of Michigan Plaza, south of Cossell Road and downgradient from existing monitoring wells MMW-P-09S/D within the Floral Park Cemetery property, to better establish the extent of vinyl chloride groundwater impacts.
- 2) The completion of two (2) additional soil borings along the north-south sewer line section immediately west of the Michigan Plaza building to evaluate the presence, if any, of residual PCE impacts.
- 3) The installation of four (4) additional monitoring wells (MMW-P-11DR replacement well, MMW-P-14S, MMW-P-14D, and MMW-P-15D) to improve the understanding of groundwater flow direction and quality southeast and southwest of Michigan Plaza.

- 4) Additional soil and groundwater analytical testing encompassing all new soil boring and monitoring well locations.
- 5) Monitoring well groundwater level gauging and groundwater potentiometric surface map development.

As indicated in the Michigan Plaza *Quarterly Monitoring Progress Report - 3rd Quarter 2011*, the results of these investigations will be provided with the *Quarterly Monitoring Progress Report – 4th Quarter 2011*, to be submitted to IDEM at the end of January 2012.

After results from these additional investigations and those of the U.S. EPA's have been evaluated, MUNDELL will provide a more complete response to the comments provided in IDEM's June 22, 2011, letter.

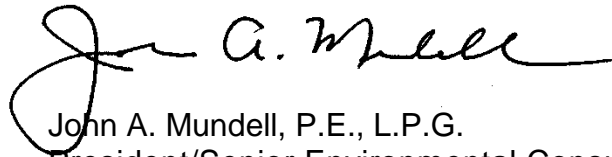
We appreciate the opportunity to provide IDEM this activity update. If you should have any questions regarding the proposed scope of work, please do not hesitate to contact us at your convenience (telephone: 317-630-9060; email: jmundell@MundellAssociates.com; swebb@MundellAssociates.com).

Sincerely,

MUNDELL & ASSOCIATES, INC.



Sarah E. Webb, L.P.G.
Project Hydrogeologist



John A. Mundell, P.E., L.P.G.
President/Senior Environmental Consultant

cc: Mr. Peter Cappel, AMMH
Ms. Shelley Lam and Mr. Tom Nash, U.S. EPA, Region V